

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Chapter 11

Outpost Pines, LLC,

Case no. 23-70617

Debtor.

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**NOTICE OF HEARING ON**  
**APPLICATIONS FOR FINAL COMPENSATION**

PLEASE TAKE NOTICE, that a hearing will be held before the Honorable Robert E Grossman at the United States Bankruptcy Court, United States Bankruptcy Court, Federal Plaza, Central Islip, New York 11722,, on December 4, 2023 at 9:30 a.m., or as soon thereafter as counsel can be heard, to consider the requests for interim compensation under section 330 of the Bankruptcy Code of (a) Backenroth Frankel & Krinsky, LLP, counsel to the Debtor, for \$110,064 in fees, plus disbursements of \$2,724 for a total of \$112,788, and that the Debtor pay that the less interim compensation paid of \$\$102,894, leaving a net amount to be paid of \$9,894 and (b) Cohen & Gresser LLP, special counsel to the Debtor for \$177,623.50 in fees, plus \$19.50 in disbursements for a total of \$177,643 less interim compensation paid of \$132,455 leaving a net amount to be paid of \$45,188. Those intending to appear at the Hearing must register with eCourt Appearances no later than two days prior to the Hearing. Instructions for registering with eCourt Appearances can be found at <https://www.nyeb.uscourts.gov/node/2126>. If you do not have internet access or are otherwise unable to register with eCourt Appearances, you may call or email Judge Grossman's courtroom deputy for instructions at 631-712-6276 [reg\\_hearings@nyeb.uscourts.gov](mailto:reg_hearings@nyeb.uscourts.gov).

PLEASE TAKE FURTHER NOTICE, that objections shall be filed electronically or with the Clerk of the Bankruptcy Court, United States Bankruptcy Court, Federal Plaza, Central Islip, New York 11722,, and served upon the undersigned and the United States Trustee, United States Bankruptcy Court, Federal Plaza, Central Islip, New York 11722; so as to be received at least seven days prior to the hearing date.

PLEASE TAKE FURTHER NOTICE, that the fee applications are available upon request of the undersigned, and may also be obtained on the Bankruptcy Court's internet site: [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov).

Dated: New York, New York  
November 10, 2023

BACKENROTH FRANKEL & KRINSKY, LLP  
Attorneys for the Debtor

By: s/Mark A. Frankel  
488 Madison Avenue Fl 23  
New York, New York 10022  
(212) 593-1100

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

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**SUMMARY SHEET: BACKENROTH FRANKEL & KRINSKY, LLP**

Interim Fees Sought	Interim Fees Awarded	Interim Expenses Sought	Interim Expenses Awarded	Fees Sought in this Application	Expenses Sought in this Application
\$110,064	\$100,064	- \$2,724	\$2,724	\$9,894	- 0 -

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Blended Hourly Rate
Mark A Frankel	1984	162.7	675	675

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

Debtor.  
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**FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF BACKENROTH FRANKEL &  
KRINSKY, LLP, PURSUANT TO SECTION 330 OF THE BANKRUPTCY  
CODE**

Backenroth Frankel & Krinsky, LLP ("BFK" or "Applicant"), attorneys for Outpost Pines, LLC (the "Debtor"), as and for its final application for allowance of compensation and reimbursement of expenses for the period of February 27, 2023 through November 1, 2023 under §330 of the Bankruptcy code, for final compensation of \$110,064 in fees, plus disbursements of \$2,724 for a total of \$112,788 and that the Debtor be authorized to pay that amount to the Applicant, less the \$102,894 previously paid, leaving a net amount to be paid of \$9,894, respectfully represents as follows:

**APPLICATION**

1. On February 27, 2023 ("Petition Date"), the Debtor filed a Chapter 11 petition under Title 11 of the United States Code, 11 U.S.C. 101 et seq. (the "Bankruptcy Code").
2. The Debtor owns, and through non-Debtor affiliates, operates properties (the "Properties") in the Fire Island Pines community (the "Pines"). The Pines is the largest LGBTQ+ resort in the United States and welcomes over 250,000 people each season.
3. The Properties are mixed-use and account for about 80% of the Pines commercial district. In season, the Debtor's non-Debtor affiliates employ 120 workers,

entertainers, DJs and other artists. The Debtor's affiliates provide the major source of food, beverage, shopping, entertainment and community to the homeowners and renters that surround the Debtor's Properties.

4. At 49 & 56 Picketty Ruff Walk, an affiliate runs the Blue Whale restaurant and bar, and the hotel featuring 19 guestrooms, a retail store and a leased office ("Hotel"). 37 Fire Island Boulevard is the Pavilion building. The ground floor features a gym and juice bar, two retail stores and administrative offices. The upper floor features the Pavilion nightclub and outside bar. 28 Fire Island Boulevard is a three-bedroom two-bathroom house that serves as a staff accommodation. 16 Atlantic Walk is a 16-bedroom/eight-bathroom residence built in 1975 and renovated in 2016 that also houses resort staff in the summer season.

5. The Properties also feature about 320 feet of frontage along the harbor, with room for 9 boat slips with an average size of 35 feet.

6. On March 31, 2015, the Debtor borrowed \$8 million from Progressive Credit Union (the "Loan") under an agreement ("Loan Agreement") to acquire the Properties. The Loan Agreement has a ten-year term, the interest rate is 3% and has a five-year extension option. The Loan was assigned to Pentagon Federal Credit Union and then to Mortgagee ECapital Loan Fund III LP.

7. The Debtor paid the Lender timely until the pandemic related government-ordered shutdown of the hospitality industry. The travel restrictions and quarantine requirements caused the Debtor to delay its 2020 seasonal opening and to dramatically curtail operations when it did open on May 29, 2020. When the government lifted restaurant and bar seating and social distancing requirements in June 2021, the Debtor and Debtor affiliates resumed reduced operations

for the 2021 season and full operations for the 2022 season. Income rebounded and exceeded pre-pandemic levels.

8. Meanwhile, the Lender agreed to defer debt service for May 2020 through September 2020 and extended the Loan maturity date from April 1, 2025 to October 1, 2025. At the Lender's request, on August 6, 2021, the Debtor made a formal written restructuring proposal, and then another on April 7, 2022.

9. By then, the Lender had accelerated its Loan and demanded payment in full of all amounts due including principal, interest, default interest and other charges. On January 19, 2022, the Lender commenced a foreclosure action in the Supreme Court of Suffolk County. The case was largely dormant while counsel to the parties continued to negotiate.

10. The Debtor repeatedly offered to reinstate the Loan once its business rebounded and it had access to enough cash. The Lender repeatedly refused tender unless the Debtor paid five times the amount of the overdue interest as a penalty for late payment.

11. On November 4, 2022, the Debtor was notified that ECapital Loan Fund III acquired the Loan.

12. Fearing the *ex-parte* appointment of receiver who likely could not preserve and protect the value of the Debtor's unique operation, the Debtor commenced this Chapter 11 case to save its business and over 120 jobs.

13. The Debtor estimates that \$7,347,551 of principal is due on the Loan. The Lender asserts that the Debtor owes about \$2,385,000 for 16% default interest, as compared to about \$532,000 for 3% regular interest. Amortization payments are due as well. The Lender also demands escrow replenishments of about \$218,000, legal fees of \$25,000 and late charges of

\$14,764, none of which the Debtor can concede absent more detail and analysis. The Debtor projects that the ultimate cure cost to reinstate the Loan will be between \$1,254,674 and \$3,108,142 for interest, amortization, escrow replenishments, legal fees and late fees.

14. Aside from mortgage debt, the Debtor's obligations include an insider loan of about \$1,549,221, an SBA disaster assistance loan of about \$161,941 and vendor claims of about \$8,200.

15. The Debtor filed its schedules, bar date application, cash collateral application, attorney retention applications and Plan and disclosure statement ("Disclosure Statement") with its Chapter 11 petition.

16. The Plan invokes section 1124(2) of the Bankruptcy Code, under which a creditor may be compelled to reinstate an obligation in default even if the obligation could not be reinstated under state law. The Debtor provided extensive briefing in the Disclosure Statement explaining why, section 1124(2), the Debtor asserts that it should not have to pay default interest as a condition to reinstatement.

17. The Court approved the Disclosure Statement at the first hearing scheduled and confirmation for May 24, 2023.

18. Following Disclosure Statement approval, the parties engaged in good faith negotiations. Those negotiations were interrupted when the Town of Brookhaven building inspector condemned the Hotel.

19. Fortunately, the conditions leading to condemnation were not as bad as feared. The repair costs were about \$60,000 to reopen the first floor.

20. Settlement negotiations resumed and the parties ultimately executed the Settlement Agreement. Under the Settlement Agreement, the parties agreed to a sale process for all of the real estate underlying the Outpost businesses on a going concern basis, including both the Debtor's real estate and the real estate owned by an ECapital affiliate subject to the Debtor's ground lease. The parties agreed that the Debtor would retain Muroff Hospitality Group as broker.

21. In full and final satisfaction of its claims against the Debtor, ECapital agreed to accept (a) a \$11,200,000 ("Breakpoint") gross purchase price until November 1, 2024 or (b) if the Properties are not sold by November 1, 2024, the Debtor will surrender its properties to ECapital. The Debtor agreed further to use reasonable efforts to reopen lapsed building permits to rebuild the Hotel (with no obligation to rebuild the Hotel), to pay ground lease rent on the Canteen, to pay debt service at the non-default contract rate of 3%, to pay real estate taxes, to operate the business, and to be responsible for any operating losses. The Debtor is entitled to retain accrued and accruing net operating income. On or before October 1, 2024, the Debtor is also obligated to deposit \$300,000 in escrow to either be applied towards the Breakpoint, or retained by ECapital if there is no sale.

22. Except for the revision to ECapital's treatment under the Plan, all other creditors are entitled to the same payment as before the revision.

23. On October 31, 2023, the Bankruptcy Court entered an order confirming the Plan as amended to incorporate the settlement, and the Plan was consummated on November 1, 2023.

24. BFK has assisted the Debtor by negotiating, filing and appearing in Court on all matters set forth above, a bar date application, retention applications. In addition, BFK has

assisted the Debtor in its interactions with third parties, consultations with co-counsel, responding to inquiries and coordinating with the Office and the United States Trustee.

25. For BFK to fulfill its responsibilities to the Debtor and its creditors, it was necessary for BFK to expend \$110,064 in time charges and \$2,724 in disbursements, for a total of \$112,788 calculated as follows:

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Total
Mark A. Frankel	1984	162.7	\$675	\$110,064
Disbursements				\$2,724
Grand Total				\$112,788

26. A schedule of time charges for the current period is annexed as Schedule A, followed by the schedule from the prior interim application.

27. A breakdown of the time charges follows for the current period follows:

Asset Disposition	0.5	\$347.50
Case Administration	0.8	\$556.00
Fee/Employment Applications	3.30	2249.00
Claims and Plan	0.1	\$69.50
Plan and Disclosure Statement (including Business Plan)	8.6	\$5,977.00
Settlement/Non-Binding ADR	1.0	\$695.00
	14.3	\$9,894.00

The breakdown of time charges copied from the prior interim application follows:

Asset Analysis and Recovery	2.6	\$1,755.00
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Asset Disposition	0.6	\$405.00
Assumption/Rejection of Leases and Contracts	3.4	\$2,295.00
Business Operations	7.3	\$4,927.50
Case Administration	13.8	\$9,315.00
Claims Administration and Objections	1.4	\$945.00
Claims and Plan	0.3	\$202.50
Discovery	4	\$2,700.00
Fee/Employment Applications	11.9	\$8,032.50
Financing/Cash Collections	2.9	\$1,957.50
Meetings of and Communications with Creditors	6.7	\$4,522.50
Other Case Assessment, Development and Administration	2.0	\$1,350.00
Other Contested Matters (excluding assumption/rejection motions)	15.3	10327.5
Plan and Disclosure Statement (including Business Plan)	56.7	\$38,272.50
Post-Trial Motions and Submissions	0.1	\$67.50
Settlement/Non-Binding ADR	19.4	\$13,095.00

**CONCLUSION**

WHEREFORE, Applicant respectfully request that the fees and disbursements be awarded in the amounts requested herein, that the Debtor be authorized to pay that amount to the Applicant, and that the Court grant such other, further and different relief as is just and proper.

Dated: New York, New York  
November 20, 2023

BACKENROTH FRANKEL & KRINSKY, LLP  
Attorneys for the Debtor

By: /s/ Mark Frankel  
488 Madison Avenue, 23<sup>rd</sup> Floor  
New York, New York 10022  
(212) 593-1100

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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**CERTIFICATE OF PROFESSIONAL**

In accordance with the **Guidelines for Fees and Disbursements for Professionals In the EASTERN District of New York Bankruptcy Cases** (the "Guidelines"), Mark Frankel, a member of the firm of Backenroth, Frankel & Krinsky, LLP, 488 Madison Avenue, New York, New York 10022 (the "Applicant"), hereby certifies as follows:

1. I have read the foregoing Application for Interim Allowance of Compensation and Reimbursement of Expenses by Counsel for the Debtor (the "Application").

2. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Amended Guidelines and the UST Guidelines for fee applications, except as specifically noted in this certification and described in the fee application.

3. Except to the extent that fees or disbursements are prohibited by these Amended Guidelines or the UST Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by the applicant and generally accepted by the applicant's clients.

4. In providing a reimbursable service, the applicant does not make a profit on the service, whether the service is performed by the applicant in-house or through a third party.

5. The debtor has been provided with periodic statements of fees and disbursements accrued.

6. A list of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent by each professional and paraprofessional, a general description of services rendered, a reasonably detailed breakdown of the disbursements incurred and an explanation of billing practices is incorporated into the attached fee application. BFK professionals and paraprofessionals providing services record their time contemporaneously on a daily basis in increments of one tenth of an hour with a description of the services formed.

7. The debtor has been provided with a copy of the relevant fee application at least 14 days before the date set by the court or any applicable rules for filing fee applications.

Dated: New York, New York  
November 20, 2023

s/ Mark Frankel

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re

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Outpost Pines, LLC

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**ORDER GRANTING APPLICATION FOR ALLOWANCE  
OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon the application (the "Application") of Backenroth Frankel & Krinsky, LLP ("BFK"), attorneys for the Debtor, for allowance of interim compensation and reimbursement of expenses for professional services rendered and expenses incurred during this Chapter 11 case, and upon the hearing held before this Court on December 4, 2023, and after due deliberation, and consideration sufficient cause appearing therefore, it is

ORDERED that the Application be, and it hereby is, granted to the extent set forth in the Schedule annexed hereto, and that the Debtor pay that amount, less the \$102,894 interim fees previously paid.

[illegible]

Case No.: 23-70617

Case Name: Outpost Pines, LLC

**Schedule B****FINAL APPLICATION TOTALS**

February 27, 2023 through November 1, 2023

(1) Applicant	(2) Total Fees Requested	(3) Total Fees to be Paid	(4) Total Expenses Requested	(5) Total Expenses to be Paid
Backenroth Frankel & Krinsky, LLP	\$110,064	\$110,064	\$2,724	\$2,724

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED:

INITIALS: \_\_\_\_\_ USBJ

OUTPOST PINES LLC  
 Backenroth, Frankel Krinsky, LLP

Date	Timekeeper	Description	Tm/Qty	Value
09/26/2023	Mark Frankel	Emails UST re plan amendment motion (.2); emails McCord re same (.1)	0.30	\$208.50
09/26/2023	Mark Frankel	Emails co-counsel re history agreement (.1); emails co-counsel re fee application (.1)	0.20	\$139.00
09/26/2023	Mark Frankel	Reviewed and revised 8/23 op reports (.3)	0.30	\$208.50
09/27/2023	Mark Frankel	Emails co-counsel re same (.1)	0.10	\$69.50
09/27/2023	Mark Frankel	T/c's co-counsel re fee application (.2)	0.20	\$139.00
09/27/2023	Mark Frankel	Revised plan and email co-counsel re same (.6)	0.60	\$417.00
09/28/2023	Mark Frankel	Revised and recirculated motion to amend plan (.5)	0.50	\$347.50
09/28/2023	Mark Frankel	Revised fee application	1.10	\$764.50
09/29/2023	Mark Frankel	Reviewed op reports (.3) b110	0.30	\$208.50
09/29/2023	Mark Frankel	Completed amended plan (1.); completed motion to amend plan (.9)	1.00	\$695.00
09/29/2023	Mark Frankel	Completed fee application	1.00	\$695.00
09/29/2023	Mark Frankel	Drafting NOH re same (.4)	0.40	\$278.00
10/09/2023	Mark Frankel	Reviewed AOS re fee application (.1)	0.10	\$69.50
10/12/2023	Mark Frankel	Email co-counsel re settlement (.2)	0.20	\$139.00
10/15/2023	Mark Frankel	Teleconference Kaiser re settlement with lender (.4)	0.40	\$278.00
10/16/2023	Mark Frankel	Reviewed op report (.1)	0.10	\$69.50
10/16/2023	Mark Frankel	Email co-counsel re settlement and 10/23 hearing (.1)	0.10	\$69.50
10/20/2023	Mark Frankel	Emails UST re conf order (.3); t/c court re zoom appearance on 10/23 (.1); email co-counsel re same (.1); t/c co-counsel and client re same (.2)	0.70	\$486.50
10/23/2023	Mark Frankel	Prep for conf hearing (.5); to court re same (1.2); 50% travel time re same (1.0)	2.70	\$1,876.50
10/24/2023	Mark Frankel	Emails UST and lender re fee orders (.2); revised fee orders (.2)	0.40	\$278.00
10/25/2023	Mark Frankel	Revised conf order re lender comments (.3); email parties re same (.2); t/c Kaiser re same (.2); t/c's McCord re same (.3)	1.00	\$695.00

OUTPOST PINES LLC  
 Backenroth, Frankel Krinsky, LLP

10/25/2023	Mark Frankel	Email court re fee orders (.3)	0.30	\$208.50
10/25/2023	Yosi Edelstein	Upload proposed Orders for BFK & CG	0.10	\$25.00
10/26/2023	Mark Frankel	Teleconference McCord re conf order revisions (.2)	0.20	\$139.00
10/27/2023	Mark Frankel	Review proposed conf order revisions (.2); emails and t/c's re same (.4)	0.60	\$417.00
10/27/2023	Mark Frankel	Email YE re fee payment (.2)	0.20	\$139.00
10/30/2023	Mark Frankel	Reviewed filed E Cap statement re deed lien (.1)	0.10	\$69.50
10/30/2023	Mark Frankel	To court (.1)	0.10	\$69.50
10/31/2023	Mark Frankel	Emails UST and lender re conf order (.2); revised conf order (.2)	0.40	\$278.00
11/01/2023	Mark Frankel	Emails YE re payments to creditors (.5)	0.50	\$347.50
11/01/2023	Mark Frankel	Review conf order and email client and co-counsel re same (.1)	0.10	\$69.50
			<b>14.30</b>	<b>\$9,894.00</b>

Date	Timekeeper	Description	Tm/Qty	Value	Task/Exp	Task/Exp Code
11/01/2023	Mark Frankel	Emails YE re payments to creditors (.5)	0.50	\$347.50	Asset Disposition	B130
09/26/2023	Mark Frankel	Reviewed and revised 8/23 op reports (.3)	0.30	\$208.50	Case Administration	B110
09/27/2023	Mark Frankel	Emails co-counsel re same (.1)	0.10	\$69.50	Case Administration	B110
09/29/2023	Mark Frankel	Reviewed op reports (.3)	0.30	\$208.50	Case Administration	B110
10/16/2023	Mark Frankel	Reviewed op report (.1)	0.10	\$69.50	Case Administration	B110
10/30/2023	Mark Frankel	Reviewed filed E Cap statement re deed lien (.1)	0.10	\$69.50	Claims and Plan	B300
09/26/2023	Mark Frankel	Emails co-counsel re history agreement (.1); emails co-counsel re fee application (.1)	0.20	\$139.00	Fee/Employment Applications	B160
09/27/2023	Mark Frankel	T/c's co-counsel re fee application (.2)	0.20	\$139.00	Fee/Employment Applications	B160
09/28/2023	Mark Frankel	Revised fee application	1.10	\$764.50	Fee/Employment Applications	B160
09/29/2023	Mark Frankel	Completed fee application	1.00	\$695.00	Fee/Employment Applications	B160
10/09/2023	Mark Frankel	Reviewed AOS re fee application (.1)	0.10	\$69.50	Fee/Employment Applications	B160
10/24/2023	Mark Frankel	Emails UST and lender re fee orders (.2); revised fee orders (.2)	0.40	\$278.00	Fee/Employment Applications	B160
10/25/2023	Yosi Edelstein	Upload proposed Orders for BFK & CG	0.10	\$25.00	Fee/Employment Applications	B160
10/27/2023	Mark Frankel	Email YE re fee payment (.2)	0.20	\$139.00	Fee/Employment Applications	B160
09/26/2023	Mark Frankel	Emails UST re plan amendment motion (.2); emails McCord re same (.1)	0.30	\$208.50	Plan and Disclosure Statement (including Business Plan)	B320
09/27/2023	Mark Frankel	Revised plan and email co-counsel re same (.6)	0.60	\$417.00	Plan and Disclosure Statement (including Business Plan)	B320
09/28/2023	Mark Frankel	Revised and recirculated motion to amend plan (.5)	0.50	\$347.50	Plan and Disclosure Statement (including Business Plan)	B320
09/29/2023	Mark Frankel	Completed amended plan (1.); completed motion to amend plan (.9)	1.00	\$695.00	Plan and Disclosure Statement (including Business Plan)	B320
09/29/2023	Mark Frankel	Drafting NOH re same (.4)	0.40	\$278.00	Plan and Disclosure Statement (including Business Plan)	B320
10/20/2023	Mark Frankel	Emails UST re conf order (.3); t/c court re zoom appearance on 10/23 (.1); email co-counsel re same (.1); t/c co-counsel and client re same (.2)	0.70	\$486.50	Plan and Disclosure Statement (including Business Plan)	B320
10/23/2023	Mark Frankel	Prep for conf hearing (.5); to court re same (1.2); 50% travel time re same (1.0)	2.70	\$1,876.50	Plan and Disclosure Statement (including Business Plan)	B320
10/25/2023	Mark Frankel	Revised conf order re lender comments (.3); email parties re same (.2); t/c Kaiser re same (.2); t/c's McCord re same (.3)	1.00	\$695.00	Plan and Disclosure Statement (including Business Plan)	B320
10/26/2023	Mark Frankel	Teleconference McCord re conf order revisions (.2)	0.20	\$139.00	Plan and Disclosure Statement (including Business Plan)	B320
10/27/2023	Mark Frankel	Review proposed conf order revisions (.2); emails and t/c's re same (.4)	0.60	\$417.00	Plan and Disclosure Statement (including Business Plan)	B320
10/30/2023	Mark Frankel	To court (.1)	0.10	\$69.50	Plan and Disclosure Statement (including Business Plan)	B320
10/31/2023	Mark Frankel	Emails UST and lender re conf order (.2); revised conf order (.2)	0.40	\$278.00	Plan and Disclosure Statement (including Business Plan)	B320

11/01/2023	Mark Frankel	Review conf order and email client and co-counsel re same (.1)	0.10	\$69.50	Plan and Disclosure Statement (including Business Plan)	B320
10/12/2023	Mark Frankel	Email co-counsel re settlement (.2)	0.20	\$139.00	Settlement/Non-Binding ADR	L160
10/15/2023	Mark Frankel	Teleconference Kaiser re settlement with lender (.4)	0.40	\$278.00	Settlement/Non-Binding ADR	L160
10/16/2023	Mark Frankel	Email co-counsel re settlement and 10/23 hearing (.1)	0.10	\$69.50	Settlement/Non-Binding ADR	L160
10/25/2023	Mark Frankel	Email court re fee orders (.3)	0.30	\$208.50	Settlement/Non-Binding ADR	L160
			<b>14.30</b>	<b>\$9,894.00</b>		

Asset Disposition	0.5	\$347.50
Case Administration	0.8	\$556.00
Fee/Employment Applications	3.30	2249.00
Claims and Plan	0.1	\$69.50
Plan and Disclosure Statement (	8.6	\$5,977.00
Settlement/Non-Binding ADR	1.0	\$695.00
	14.3	\$9,894.00

Backenroth, Frankel & Krinsky, LLP

Time Entries

Matter: Outpost Pines LLC

Outpost Pines  
 Backenroth, Frankel Krinsky, LLP  
 Post-Petition time

Date	Timekeeper	Description	Tm/Qty	Value
02/23/2023	Mark Frankel	Revised and filed petition, schedules and state of financial affairs (2.0); revised local rule affidavit (1.0); email client re filing Ch. 11 procedures (1.5); t/c's and emails co-counsel re same (.5)	5	\$3,375.00
02/24/2023	Mark Frankel	Revised C&G retention application	0.5	\$337.50
02/24/2023	Mark Frankel	Teleconferences client Ch. 11 Plan Projections	0.3	\$202.50
02/24/2023	Mark Frankel	Emails UST re closed bank account and proof of insurance (.1); t/c's client re Ch. 11 procedures (.7)	0.8	\$540.00
02/24/2023	Mark Frankel	Completed, filed and served bar date application	0.5	\$337.50
02/27/2023	Mark Frankel	Completed plan and disclosure statement	2	\$1,350.00
02/27/2023	Mark Frankel	Teleconferences client re projections	0.5	\$337.50
02/27/2023	Mark Frankel	Revised Local Rule affidavit	0.2	\$135.00
02/27/2023	Mark Frankel	Circulated retention apps	0.1	\$67.50
02/28/2023	Mark Frankel	Emails co-counsel re E Capital notice of appearance (.2); emails UST re same and re retention (.1)	0.3	\$202.50
02/28/2023	Mark Frankel	Drafting ground lease assumption motion	2	\$1,350.00
02/28/2023	Mark Frankel	Drafting cash collateral motion	2	\$1,350.00
02/28/2023	Mark Frankel	Revised plan and disclosure statement (2.0); t/c co-counsel re plan (.2)	2.2	\$1,485.00
02/28/2023	Mark Frankel	Completed and circulated retention applications	0.5	\$337.50
02/28/2023	Mark Frankel	Served bar date notice (.2)	0.2	\$135.00
03/01/2023	Mark Frankel	Completed, filed and served plan disclosure statement and NOH re same (1.0); completed, filed and served cash collateral application (1.0)	2	\$1,350.00
03/01/2023	Mark Frankel	Filed AOS re bar date	0.1	\$67.50
03/01/2023	Mark Frankel	Revised retention applications	1	\$675.00
03/01/2023	Mark Frankel	Revised lease assumption motion	1	\$675.00
03/02/2023	Mark Frankel	Filed AOS re 3/1/23 (.1); emails client re same (.3)	0.4	\$270.00

Outpost Pines  
 Backenroth, Frankel Krinsky, LLP  
 Post-Petition time

03/02/2023	Mark Frankel	Prep for and to IDI (2.0); t/c McCord re status (.1)	2.1	\$1,417.50
03/03/2023	Mark Frankel	Email client re org chart and UST	0.1	\$67.50
03/06/2023	Mark Frankel	Teleconference McCord re settlement (.3); t/c client re same (1.1)	1.4	\$945.00
03/14/2023	Mark Frankel	Emails client and UST re DIP account and insurance renewal (.1)	0.1	\$67.50
03/16/2023	Mark Frankel	Emails UST re insurance and bar date accounts (.1)	0.1	\$67.50
03/16/2023	Mark Frankel	Email client re op reports (.1)	0.1	\$67.50
03/17/2023	Mark Frankel	Emails McCord re settlement (.1)	0.1	\$67.50
03/17/2023	Mark Frankel	Email client re insider claims (.1)	0.1	\$67.50
03/20/2023	Mark Frankel	Email McCord re settlement (.1); t/c co-counsel re same (.1)	0.2	\$135.00
03/21/2023	Mark Frankel	Teleconference McCord re settlement (.1); t/c's client and co-counsel re same (.2)	0.3	\$202.50
03/21/2023	Mark Frankel	Review op report and emails client re same (.1)	0.1	\$67.50
03/22/2023	Mark Frankel	Email client re access for lender appraisal (.1); emails lender re same (.1)	0.2	\$135.00
03/22/2023	Mark Frankel	Completed and filed 2/23 op report (.2)	0.2	\$135.00
03/23/2023	Mark Frankel	Teleconferences and emails client re access for lender appraisal (.2); emails lender re same (.1)	0.3	\$202.50
03/27/2023	Mark Frankel	Prep for and to 341 meeting (1.5); to 341 meeting (1.2); email co-counsel re same (.1); email client re ins renewal (.1); t/c's client and co-counsel re 341 (.3); email UST re ins documents (.1)	3.1	\$2,092.50
03/28/2023	Mark Frankel	Emails UST re leases and insurance (.1)	0.1	\$67.50
03/28/2023	Mark Frankel	Teleconferences and emails client re access for lender appraiser (.2); emails lender re same (.1)	0.3	\$202.50
03/30/2023	Mark Frankel	Emails client re same (.1)	0.1	\$67.50
03/30/2023	Mark Frankel	Emails UST re closed account and insurance removal (.1)	0.1	\$67.50
04/04/2023	Mark Frankel	Prep for 4/5 hearing (1.1)	1.1	\$742.50
04/04/2023	Mark Frankel	Teleconferences McCord re settlement (.3); t/c's and emails client re same (1.1)	1.4	\$945.00

Outpost Pines  
 Backenroth, Frankel Krinsky, LLP  
 Post-Petition time

04/04/2023	Mark Frankel	Emails client re 4/5 hearing (.2)	0.2	\$135.00
04/05/2023	Mark Frankel	Prep for and to lease assumption hearing (.2); uploaded lease assumption order (.1)	0.3	\$202.50
04/05/2023	Mark Frankel	Prep for and to conf hearing (2.0); uploaded disclosure statement order (.1)	2.1	\$1,417.50
04/05/2023	Mark Frankel	Prep for disclosure hearing (1.0); to court re same (1.0); uploaded disclosure statement order (.1); uploaded retention order (.1)	0.1	\$67.50
04/05/2023	Mark Frankel	Prep for cash collateral hearing (.1); to court re same (.2) Uploaded cash collateral order (.1)	0.4	\$270.00
04/05/2023	Mark Frankel	Prep for retention application hearing (.1); to court re same (.2)	0.3	\$202.50
04/05/2023	Mark Frankel	Prep for status conf (.4); to court re same (.1)	0.5	\$337.50
04/10/2023	Mark Frankel	Review lender POC (.1); email co-counsel and client re same (.1)	0.2	\$135.00
04/10/2023	Mark Frankel	Reviewed orders entered (.2)	0.2	\$135.00
04/10/2023	Mark Frankel	Revised and served disclosure statement (1.1)	1.1	\$742.50
04/11/2023	Mark Frankel	Teleconference and email tenant client re E Capital POC (.4)	0.4	\$270.00
04/11/2023	Mark Frankel	Filed AOS re plan and disclosure statement (.1)	0.1	\$67.50
04/14/2023	Mark Frankel	Filed AOS re plan and disclosure statement (.1)	0.1	\$67.50
04/17/2023	Mark Frankel	Teleconference lender re settlement (.2); email client re same (.2); t/c client re same (.1)	0.1	\$67.50
04/18/2023	Mark Frankel	Emails client re mortgage payments (.2)	0.2	\$135.00
04/19/2023	Mark Frankel	Reviewed op report (.2); email client re same (.1)	0.3	\$202.50
04/20/2023	Mark Frankel	Reviewed op report (.4)	0.4	\$270.00
04/20/2023	Mark Frankel	t/c's client and lender re settlement (.6); emails client re same (.3); emails lender re same (.2)	1.1	\$742.50
04/20/2023	Mark Frankel	Teleconference co-counsel re lender liability research (.1)	0.1	\$67.50
04/20/2023	Mark Frankel	Email client re ground lease (.1)	0.1	\$67.50
04/24/2023	Mark Frankel	c/c client re settlement (.7)	0.7	\$472.50
04/26/2023	Mark Frankel	Teleconference McCord re settlement options (.3)	0.3	\$202.50
04/27/2023	Mark Frankel	Prep lender re settlement (.4); to call re same (.4) c/c client and co-counsel re same (.3)	1.1	\$742.50

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05/01/2023	Mark Frankel	Emails client re settlement (.1)	0.1	\$67.50
05/08/2023	Mark Frankel	Teleconferences client and co-counsel re settlement (.3); emails client and co-counsel re same (.2); email McCord re same (.1)	0.6	\$405.00
05/09/2023	Mark Frankel	Email McCord re settlement (.1); emails client re same (.7); t/c McCord re same (.2)	1	\$675.00
05/09/2023	Mark Frankel	Email client re Ch. 11 confirmation requirement (.2)	0.2	\$135.00
05/11/2023	Mark Frankel	Emails client re settlement with lender (.1); t/c client re same (.2)	0.3	\$202.50
05/12/2023	Mark Frankel	t/c's McCord re Hotel condemnation (.1); t/c client re same (.1)	0.2	\$135.00
05/14/2023	Mark Frankel	to c/c with client re hotel condemnation and Ch. 11 plan strategy (1.8)	1.8	\$1,215.00
05/15/2023	Mark Frankel	Teleconferences and emails court and UST re adj (.1)	0.1	\$67.50
05/15/2023	Mark Frankel	to meeting with lender re settlement (1.6); prepare same (.4); emails client and co-counsel re same (.1); t/c client and co-counsel re same (.4)	2.1	\$1,417.50
05/15/2023	Mark Frankel	Email lender re Town of Brookhaven notice (.1)	0.1	\$67.50
05/16/2023	Mark Frankel	emails court and UST re adj (.2); emails client and lender re same (.3)	0.1	\$67.50
05/17/2023	Mark Frankel	Reviewed lender conf obj. (.3); emails client re same (.1); t/c client re same (.2)	0.6	\$405.00
05/17/2023	Mark Frankel	Emails lender re adj (.2); emails client re same (.2)	0.4	\$270.00
05/18/2023	Mark Frankel	Emails co-counsel re 5/24 hearing (.1); t/c's co-counsel re same (.5)	0.6	\$405.00
05/19/2023	Mark Frankel	Drafting reply to conf obj (.5); emails client re same (.3); t/c co-counsel re same (.2); email co-counsel re same (.1)	1.1	\$742.50
05/19/2023	Mark Frankel	Reviewed and revised op report (.4)	0.4	\$270.00
05/20/2023	Mark Frankel	Emails Markowitz re 1124(2) (1.1)	1.1	\$742.50
05/22/2023	Mark Frankel	Drafting reply to conf obj (2.5); t/c's client re co-counsel re same (.4); email client and co-counsel re same (.1)	3	\$2,025.00
05/23/2023	Mark Frankel	Revised plan confirmation status report (1.0)	1.1	\$742.50
05/24/2023	Mark Frankel	Teleconferences client and co-counsel re hotel building operation and insurance (1.3); emails client and co-counsel re same (.2); t/c emails McCord re same (.3); email McCord re same (.1)	1.9	\$1,282.50

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05/24/2023	Mark Frankel	to court on conf hearing (1.4); prep re same (1.4)	1.8	\$1,215.00
05/25/2023	Mark Frankel	Drafted statement re Hotel operation (.7)	0.7	\$472.50
05/25/2023	Mark Frankel	Emails client re insurance pages (.2); emails lender re same (.2)	0.4	\$270.00
05/25/2023	Mark Frankel	Email co-counsel re condemnation research (.1)	0.1	\$67.50
05/25/2023	Mark Frankel	Reviewed Town letter and drafted and served statement re Hotel bldg condemnation (.8); emails co-counsel, and client re letter re condemnation (1.3); emails lender re same (.2)	2.3	\$1,552.50
05/26/2023	Mark Frankel	Email McCord re insurance policies (.3)	0.3	\$202.50
05/26/2023	Mark Frankel	Emails client and co-counsel re lender rights under insurance and info re property (1.0); t/c client re same (.9)	1.9	\$1,282.50
05/30/2023	Mark Frankel	Email client re copies of insurance (1.)	0.1	\$67.50
06/01/2023	Mark Frankel	Emails client re status of Hotel building (.2)	0.2	\$135.00
06/02/2023	Mark Frankel	Review co-counsel memo re Brookhaven condemnation rules (.3); email clients and co-counsel re plans to repair (.2)	0.5	\$337.50
06/06/2023	Mark Frankel	Review 2004 application and order (.2) email co-counsel re same (.3)	0.5	\$337.50
06/12/2023	Mark Frankel	Email client and co-counsel re response to 2004 (.1); t/c's co-counsel re condemnation (.5)	0.6	\$405.00
06/12/2023	Mark Frankel	Email client re 4/23 MOR (.1); email UST re same (.1)	0.2	\$135.00
06/14/2023	Mark Frankel	Reviewed conversion motion (.5); discussions with t/c co-counsel re case strategy re same (1.5)	2	\$1,350.00
06/16/2023	Mark Frankel	Teleconference co-counsel re settlement (.2)	0.2	\$135.00
06/16/2023	Mark Frankel	Teleconference co-counsel re response to 2004 application (.2)	0.2	\$135.00
06/20/2023	Mark Frankel	Teleconference McCord re 2004 response (.1); emails co-counsel re same (.1)	0.2	\$135.00
06/21/2023	Abe Backenroth	Emails co-counsel re discover (.1)	0.1	\$67.50
06/21/2023	Abe Backenroth	Reviewed 5/23 op report (.1); emails client re same (.2)	0.3	\$202.50
06/22/2023	Mark Frankel	Emails and t/c's co-counsel re discovery (.7)	0.7	\$472.50
06/23/2023	Mark Frankel	Review debtor document production (.5)	0.5	\$337.50
06/26/2023	Mark Frankel	Email co-counsel re 2004 depo (.1)	0.1	\$67.50
06/26/2023	Mark Frankel	Emails client re obj for trustee motion (.1)	0.1	\$67.50

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 Backenroth, Frankel Krinsky, LLP  
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06/26/2023	Mark Frankel	Review Seahorse briefing on 1124 issues (.4)	0.4	\$270.00
06/27/2023	Mark Frankel	Emails co-counsel re discovery (.2); emails E Capital re discovery (.2)	0.4	\$270.00
06/27/2023	Mark Frankel	Emails co-counsel re obj to trustee motion (.2); to meeting co-counsel re obj to trustee motion (.5)	0.7	\$472.50
06/28/2023	Mark Frankel	t/c's co-counsel re 6/28 depositions and settlement (.3); emails co-counsel re same (.1)	0.3	\$202.50
06/29/2023	Mark Frankel	Drafting conversion obj. (8.0); email client re same (.1)	8.1	\$5,467.50
06/29/2023	Mark Frankel	Emails co-counsel re same (.1); t/c co-counsel re same (.1)	0.2	\$135.00
06/29/2023	Mark Frankel	Emails and t/c's McCord re discovery and settlement (.2)	0.2	\$135.00
07/01/2023	Mark Frankel	Teleconference co-counsel re plan strategy (.5)	0.5	\$337.50
07/02/2023	Mark Frankel	Drafting notes for conf hearing (4.9)	4.9	\$3,307.50
07/03/2023	Mark Frankel	Completed conversion obj (6.0)	6	\$4,050.00
07/05/2023	Mark Frankel	Teleconference client re settlement (.1); t/c and emails McCord re same (.1)	0.2	\$135.00
07/05/2023	Mark Frankel	Drafting conf affidavit (2.9); drafting ballot cert. (.3) t/c's client re conf hearing documents (.3); email client re same (.2)	3.7	\$2,497.50
07/06/2023	Mark Frankel	Teleconference client re 7/10 hearing prep (.2); review lender reply (.3) emails client re same (.2)	0.7	\$472.50
07/07/2023	Mark Frankel	Emails McCord re settlement (.1); emails client re same (.1)	0.2	\$135.00
07/07/2023	Mark Frankel	t/c's client re 7/10 hearing (.6); emails client re same (.1); revised conf affidavit re same (2.5)	3.2	\$2,160.00
07/08/2023	Mark Frankel	Prep for 7/10 23 hearing (1.8)	1.8	\$1,215.00
07/09/2023	Mark Frankel	Prep for 7/10/23 hearing (3.5)	3.5	\$2,362.50
07/10/2023	Mark Frankel	To court on plan confirmation (4.0); prep with client and co-counsel re same (1.0)	5	\$3,375.00
07/11/2023	Mark Frankel	Teleconference co-counsel re settlements (.2)	0.2	\$135.00

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 Backenroth, Frankel Krinsky, LLP  
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07/12/2023	Mark Frankel	To C/C re settlement (.5)	0.5	\$337.50
07/14/2023	Mark Frankel	Teleconferences and emails client and co-counsel re adj for settlement purposes(.4); emails McCord re same (.1); email client re same(.1)	0.5	\$337.50
07/17/2023	Mark Frankel	emails client re real estate broker (.3)	0.3	\$202.50
07/25/2023	Mark Frankel	Teleconference co-counsel re settlement and sale of property (.6); email McCord re same (.1)	0.7	\$472.50
07/25/2023	Mark Frankel	Reviewed 6/23 op report (.3); email UST re same (.1)	0.4	\$270.00
07/27/2023	Mark Frankel	Emails co-counsel re sale of property (.1)	0.1	\$67.50
07/27/2023	Mark Frankel	Emails co-counsel re construction update (.1)	0.1	\$67.50
08/01/2023	Mark Frankel	Emails co-counsel re settlement meeting (.1)	0.1	\$67.50
08/01/2023	Mark Frankel	Research re recent reinstatement case law (.5)	0.5	\$337.50
08/02/2023	Mark Frankel	Email client re recent reinstatement case law (.4)	0.4	\$270.00
08/04/2023	Mark Frankel	Emails co-counsel and lender re appraisal (.1)	0.1	\$67.50
08/07/2023	Mark Frankel	Reviewed appraisal (.3); prep for c/c lender re settlement (.5); c/c lender re settlement (.5)	1.3	\$877.50
08/08/2023	Mark Frankel	Teleconference co-counsel re settlement meeting and next steps (.5)	0.5	\$337.50
08/10/2023	Mark Frankel	Email co-counsel and lender counsel re settlement and sale (.1)	0.1	\$67.50
08/11/2023	Mark Frankel	Emails co-counsel re settlement and sale (.1) t/c's co-counsel re same (.4)	0.5	\$337.50
08/11/2023	Mark Frankel	Drafting fee application (1.5)	1.5	\$1,012.50
08/14/2023	Mark Frankel	Drafting fee application (2.5)	2.5	\$1,687.50
08/17/2023	Mark Frankel	Drafting fee application (.2)	0.2	\$135.00
08/18/2023	Mark Frankel	Email co-counsel re settlement term sheet (.1); reviewed same (.4)	0.5	\$337.50
08/21/2023	Mark Frankel	Emails ECapital re broker retention (.1)	0.1	\$67.50
08/21/2023	Mark Frankel	Drafted exclusivity extension motion (1.9)	1.9	\$1,282.50
08/21/2023	Mark Frankel	Email co-counsel re revisions to term settlement sheet (.1)	0.1	\$67.50
08/22/2023	Mark Frankel	Reviewed revised settlement term sheet and email co-counsel re same (.3)	0.3	\$202.50
08/22/2023	Mark Frankel	Reviewed 7/23 op report (.2)	0.2	\$135.00
08/22/2023	Mark Frankel	Reviewed AOS re exclusivity extension motion (.1)	0.1	\$67.50
08/23/2023	Mark Frankel	Drafting fee application (1.5)	1.5	\$1,012.50
			<b>129.60</b>	<b>\$87,480.00</b>

Backenroth, Frankel & Krinsky, LLP

Time Entries Sorted by Category

Matter: Outpost Pines LLC

Outpost Pines  
 Backenroth, Frankel Krinsky, LLP  
 Post-Petition time - Categorized

Date	Timekeeper	Description	Tm/Qty	Value
5/26/2023	Mark Frankel	Emails client and co-counsel re lender rights under insurance and info re property (1.0); t/c client re same (.9)	1.9	\$1,282.50
6/1/2023	Mark Frankel	Emails client re status of Hotel building (.2)	0.2	\$135.00
6/2/2023	Mark Frankel	Review co-counsel memo re Brookhaven condemnation rules (.3); email clients and co-counsel re plans to repair (.2)	0.5	\$337.50
<b>Asset Analysis and Recovery</b>			<b>2.6</b>	<b>\$1,755.00</b>
7/17/2023	Mark Frankel	emails client re real estate broker (.3)	0.3	\$202.50
7/27/2023	Mark Frankel	Emails co-counsel re sale of property (.1)	0.1	\$67.50
8/10/2023	Mark Frankel	Email co-counsel and lender counsel re settlement and sale (.1)	0.1	\$67.50
8/21/2023	Mark Frankel	Emails ECapital re broker retention (.1)	0.1	\$67.50
<b>Asset Disposition</b>			<b>0.6</b>	<b>\$405.00</b>
2/28/2023	Mark Frankel	Drafting ground lease assumption motion	2.0	\$1,350.00
3/1/2023	Mark Frankel	Revised lease assumption motion	1.0	\$675.00
4/5/2023	Mark Frankel	Prep for and to lease assumption hearing (.2); uploaded lease assumption order (.1)	0.3	\$202.50
4/20/2023	Mark Frankel	Email client re ground lease (.1)	0.1	\$67.50
<b>Assumption/Rejection of Leases and Contracts</b>			<b>3.4</b>	<b>\$2,295.00</b>
4/18/2023	Mark Frankel	Emails client re mortgage payments (.2)	0.2	\$135.00
5/12/2023	Mark Frankel	t/c's McCord re Hotel condemnation (.1); t/c client re same (.1)	0.2	\$135.00
5/14/2023	Mark Frankel	to c/c with client re hotel condemnation and Ch. 11 plan strategy (1.8)	1.8	\$1,215.00
5/24/2023	Mark Frankel	Teleconferences client and co-counsel re hotel building operation and insurance (1.3); emails client and co-counsel re same (.2); t/c emails McCord re same (.3); email McCord re same (.1)	1.9	\$1,282.50
5/25/2023	Mark Frankel	Drafted statement re Hotel operation (.7)	0.7	\$472.50
5/25/2023	Mark Frankel	Reviewed Town letter and drafted and served statement re Hotel bldg condemnation (.8); emails co-counsel, and client re letter re condemnation (1.3); emails lender re same (.2)	2.3	\$1,552.50
5/30/2023	Mark Frankel	Email client re copies of insurance (1.)	0.1	\$67.50
7/27/2023	Mark Frankel	Emails co-counsel re construction update (.1)	0.1	\$67.50
<b>Business Operations</b>			<b>7.3</b>	<b>\$4,927.50</b>
2/23/2023	Mark Frankel	Revised and filed petition, schedules and state of financial affairs (2.0); revised local rule affidavit (1.0); email client re filing Ch. 11 procedures (1.5); t/c's and emails co-counsel re same (.5)	5.0	\$3,375.00
2/24/2023	Mark Frankel	Emails UST re closed bank account and proof of insurance (.1); t/c's client re Ch. 11 procedures (.7)	0.8	\$540.00
2/27/2023	Mark Frankel	Revised Local Rule affidavit	0.2	\$135.00
2/28/2023	Mark Frankel	Emails co-counsel re E Capital notice of appearance (.2); emails UST re same and re retention (.1)	0.3	\$202.50
3/2/2023	Mark Frankel	Filed AOS re 3/1/23 (.1); emails client re same (.3)	0.4	\$270.00
3/16/2023	Mark Frankel	Email client re op reports (.1)	0.1	\$67.50
3/21/2023	Mark Frankel	Review op report and emails client re same (.1)	0.1	\$67.50
3/22/2023	Mark Frankel	Completed and filed 2/23 op report (.2)	0.2	\$135.00
4/4/2023	Mark Frankel	Prep for 4/5 hearing (1.1)	1.1	\$742.50
4/5/2023	Mark Frankel	Prep for status conf (.4); to court re same (.1)	0.5	\$337.50
4/10/2023	Mark Frankel	Reviewed orders entered (.2)	0.2	\$135.00
4/19/2023	Mark Frankel	Reviewed op report (.2); email client re same (.1)	0.3	\$202.50
4/20/2023	Mark Frankel	Reviewed op report (.4)	0.4	\$270.00

## Outpost Pines

Backenroth, Frankel Krinsky, LLP

Post-Petition time - Categorized

5/15/2023	Mark Frankel	Teleconferences and emails court and UST re adj (.1)	0.1	\$67.50
5/16/2023	Mark Frankel	emails court and UST re adj (.2); emails client and lender re same (.3)	0.1	\$67.50
5/17/2023	Mark Frankel	Emails lender re adj (.2); emails client re same (.2)	0.4	\$270.00
5/19/2023	Mark Frankel	Reviewed and revised op report (.4)	0.4	\$270.00
5/25/2023	Mark Frankel	Emails client re insurance pages (.2); emails lender re same (.2)	0.4	\$270.00
5/26/2023	Mark Frankel	Email McCord re insurance policies (.3)	0.3	\$202.50
6/12/2023	Mark Frankel	Email client re 4/23 MOR (.1); email UST re same (.1)	0.2	\$135.00
6/21/2023	Abe Backenroth	Reviewed 5/23 op report (.1); emails client re same (.2)	0.3	\$202.50
7/25/2023	Mark Frankel	Reviewed 6/23 op report (.3); email UST re same (.1)	0.4	\$270.00
8/17/2023	Mark Frankel	Drafting fee application (.2)	0.2	\$135.00
8/22/2023	Mark Frankel	Reviewed 7/23 op report (.2)	0.2	\$135.00
<b>Case Administration</b>			<b>12.6</b>	<b>\$8,505.00</b>

2/24/2023	Mark Frankel	Completed, filed and served bar date application	0.5	\$337.50
2/28/2023	Mark Frankel	Served bar date notice (.2)	0.2	\$135.00
3/1/2023	Mark Frankel	Filed AOS re bar date	0.1	\$67.50
3/17/2023	Mark Frankel	Email client re insider claims (.1)	0.1	\$67.50
4/11/2023	Mark Frankel	Teleconference and email tenant client re E Capital POC (.4)	0.4	\$270.00
4/20/2023	Mark Frankel	Teleconference co-counsel re lender liability research (.1)	0.1	\$67.50
<b>Claims Administration and Objections</b>			<b>1.4</b>	<b>\$945.00</b>

4/10/2023	Mark Frankel	Review lender POC (.1); email co-counsel and client re same (.1)	0.2	\$135.00
8/22/2023	Mark Frankel	Reviewed AOS re exclusivity extension motion (.1)	0.1	\$67.50
<b>Claims and Plan</b>			<b>0.3</b>	<b>\$202.50</b>

6/6/2023	Mark Frankel	Review 2004 application and order (.2) email co-counsel re same (.3)	0.5	\$337.50
6/12/2023	Mark Frankel	Email client and co-counsel re response to 2004 (.1); t/c's co-counsel re condemnation (.5)	0.6	\$405.00
6/16/2023	Mark Frankel	Teleconference co-counsel re response to 2004 application (.2)	0.2	\$135.00
6/20/2023	Mark Frankel	Teleconference McCord re 2004 response (.1); emails co-counsel re same (.1)	0.2	\$135.00
6/21/2023	Abe Backenroth	Emails co-counsel re discover (.1)	0.1	\$67.50
6/22/2023	Mark Frankel	Emails and t/c's co-counsel re discovery (.7)	0.7	\$472.50
6/23/2023	Mark Frankel	Review debtor document production (.5)	0.5	\$337.50
6/26/2023	Mark Frankel	Email co-counsel re 2004 depo (.1)	0.1	\$67.50
6/27/2023	Mark Frankel	Emails co-counsel re discovery (.2); emails E Capital re discovery (.2)	0.4	\$270.00
6/29/2023	Mark Frankel	Emails and t/c's McCord re discovery and settlement (.2)	0.2	\$135.00
7/12/2023	Mark Frankel	To C/C re settlement (.5)	0.5	\$337.50
<b>Discovery</b>			<b>4.0</b>	<b>\$2,700.00</b>

2/24/2023	Mark Frankel	Revised C&G retention application	0.5	\$337.50
2/27/2023	Mark Frankel	Circulated retention apps	0.1	\$67.50
2/28/2023	Mark Frankel	Completed and circulated retention applications	0.5	\$337.50
3/1/2023	Mark Frankel	Revised retention applications	1.0	\$675.00
3/20/2023	Mark Frankel	Email McCord re settlement (.1); t/c co-counsel re same (.1)	0.2	\$135.00

## Outpost Pines

Backenroth, Frankel Krinsky, LLP

Post-Petition time - Categorized

3/21/2023	Mark Frankel	Teleconference McCord re settlement (.1); t/c's client and co-counsel re same (.2)	0.3	\$202.50
4/5/2023	Mark Frankel	Prep for disclosure hearing (1.0); to court re same (1.0); uploaded disclosure statement order (.1); uploaded retention order (.1)	0.1	\$67.50
4/5/2023	Mark Frankel	Prep for retention application hearing (.1); to court re same (.2)	0.3	\$202.50
5/9/2023	Mark Frankel	Email McCord re settlement (.1); emails client re same (.7); t/c McCord re same (.2)	1.0	\$675.00
8/11/2023	Mark Frankel	Drafting fee application (1.5)	1.5	\$1,012.50
8/14/2023	Mark Frankel	Drafting fee application (2.5)	2.5	\$1,687.50
8/23/2023	Mark Frankel	Drafting fee application (1.5)	1.5	\$1,012.50
<b>Fee/Employment Applications</b>			<b>9.5</b>	<b>\$6,412.50</b>

2/27/2023	Mark Frankel	Teleconferences client re projections	0.5	\$337.50
2/28/2023	Mark Frankel	Drafting cash collateral motion	2.0	\$1,350.00
4/5/2023	Mark Frankel	Prep for cash collateral hearing (.1); to court re same (.2) Uploaded cash collateral order (.1)	0.4	\$270.00
<b>Financing/Cash Collections</b>			<b>2.9</b>	<b>\$1,957.50</b>

3/2/2023	Mark Frankel	Prep for and to IDI (2.0); t/c McCord re status (.1)	2.1	\$1,417.50
3/3/2023	Mark Frankel	Email client re org chart and UST	0.1	\$67.50
3/14/2023	Mark Frankel	Emails client and UST re DIP account and insurance renewal (.1)	0.1	\$67.50
3/16/2023	Mark Frankel	Emails UST re insurance and bar date accounts (.1)	0.1	\$67.50
3/22/2023	Mark Frankel	Email client re access for lender appraisal (.1); emails lender re same (.1)	0.2	\$135.00
3/23/2023	Mark Frankel	Teleconferences and emails client re access for lender appraisal (.2); emails lender re same (.1)	0.3	\$202.50
3/27/2023	Mark Frankel	Prep for and to 341 meeting (1.5); to 341 meeting (1.2); email co-counsel re same (.1); email client re ins renewal (.1); t/c's client and co-counsel re 341 (.3); email UST re ins documents (.1)	3.1	\$2,092.50
3/28/2023	Mark Frankel	Emails UST re leases and insurance (.1)	0.1	\$67.50
3/28/2023	Mark Frankel	Teleconferences and emails client re access for lender appraiser (.2); emails lender re same (.1)	0.3	\$202.50
3/30/2023	Mark Frankel	Emails client re same (.1)	0.1	\$67.50
3/30/2023	Mark Frankel	Emails UST re closed account and insurance removal (.1)	0.1	\$67.50
5/15/2023	Mark Frankel	Email lender re Town of Brookhaven notice (.1)	0.1	\$67.50
<b>Meetings of and Communications with Creditors</b>			<b>6.7</b>	<b>\$4,522.50</b>

6/14/2023	Mark Frankel	Reviewed conversion motion (.5); discussions with t/c co-counsel re case strategy re same (1.5)	2.0	\$1,350.00
<b>Other Case Assessment, Development and Administration</b>			<b>2.0</b>	<b>\$1,350.00</b>

5/25/2023	Mark Frankel	Email co-counsel re condemnation research (.1)	0.1	\$67.50
6/26/2023	Mark Frankel	Emails client re obj for trustee motion (.1)	0.1	\$67.50
6/27/2023	Mark Frankel	Emails co-counsel re obj to trustee motion (.2); to meeting co-counsel re obj to trustee motion (.5)	0.7	\$472.50
6/29/2023	Mark Frankel	Drafting conversion obj. (8.0); email client re same (.1)	8.1	\$5,467.50
7/3/2023	Mark Frankel	Completed conversion obj (6.0)	6.0	\$4,050.00
8/22/2023	Mark Frankel	Reviewed revised settlement term sheet and email co-counsel re same (.3)	0.3	\$202.50
<b>Other Contested Matters (excluding assumption/rejection motions)</b>			<b>15.3</b>	<b>\$10,327.50</b>

Outpost Pines  
 Backenroth, Frankel Krinsky, LLP  
 Post-Petition time - Categorized

2/24/2023	Mark Frankel	Teleconferences client Ch. 11 Plan Projections	0.3	\$202.50
2/27/2023	Mark Frankel	Completed plan and disclosure statement	2.0	\$1,350.00
2/28/2023	Mark Frankel	Revised plan and disclosure statement (2.0); t/c co-counsel re plan (.2)	2.2	\$1,485.00
3/1/2023	Mark Frankel	Completed, filed and served plan disclosure statement and NOH re same (1.0); completed, filed and served cash collateral application (1.0)	2.0	\$1,350.00
4/4/2023	Mark Frankel	Emails client re 4/5 hearing (.2)	0.2	\$135.00
4/5/2023	Mark Frankel	Prep for and to conf hearing (2.0); uploaded disclosure statement order (.1)	2.1	\$1,417.50
4/10/2023	Mark Frankel	Revised and served disclosure statement (1.1)	1.1	\$742.50
4/11/2023	Mark Frankel	Filed AOS re plan and disclosure statement (.1)	0.1	\$67.50
4/14/2023	Mark Frankel	Filed AOS re plan and disclosure statement (.1)	0.1	\$67.50
5/9/2023	Mark Frankel	Email client re Ch. 11 confirmation requirement (.2)	0.2	\$135.00
5/17/2023	Mark Frankel	Reviewed lender conf obj. (.3); emails client re same (.1); t/c client re same (.2)	0.6	\$405.00
5/18/2023	Mark Frankel	Emails co-counsel re 5/24 hearing (.1); t/c's co-counsel re same (.5)	0.6	\$405.00
5/19/2023	Mark Frankel	Drafting reply to conf obj (.5); emails client re same (.3); t/c co-counsel re same (.2); email co-counsel re same (.1)	1.1	\$742.50

## Outpost Pines

Backenroth, Frankel Krinsky, LLP

Post-Petition time - Categorized

5/20/2023	Mark Frankel	Emails Markowitz re 1124(2) (1.1)	1.1	\$742.50
5/22/2023	Mark Frankel	Drafting reply to conf obj (2.5); t/c's client re co-counsel re same (.4); email client and co-counsel re same (.1)	3.0	\$2,025.00
5/23/2023	Mark Frankel	Revised plan confirmation status report (1.0)	1.1	\$742.50
5/24/2023	Mark Frankel	to court on conf hearing (1.4); prep re same (1.4)	1.8	\$1,215.00
6/26/2023	Mark Frankel	Review Seahorse briefing on 1124 issues (.4)	0.4	\$270.00
7/1/2023	Mark Frankel	Teleconference co-counsel re plan strategy (.5)	0.5	\$337.50
7/2/2023	Mark Frankel	Drafting notes for conf hearing (4.9)	4.9	\$3,307.50
7/5/2023	Mark Frankel	Drafting conf affidavit (2.9); drafting ballot cert. (.3) t/c's client re conf hearing documents (.3); email client re same (.2)	3.7	\$2,497.50
7/6/2023	Mark Frankel	Teleconference client re 7/10 hearing prep (.2); review lender reply (.3) emails client re same (.2)	0.7	\$472.50
7/7/2023	Mark Frankel	t/c's client re 7/10 hearing (.6); emails client re same (.1); revised conf affidavit re same (2.5)	3.2	\$2,160.00
7/8/2023	Mark Frankel	Prep for 7/10 23 hearing (1.8)	1.8	\$1,215.00
7/9/2023	Mark Frankel	Prep for 7/10/23 hearing (3.5)	3.5	\$2,362.50
7/10/2023	Mark Frankel	To court on plan confirmation (4.0); prep with client and co-counsel re same (1.0)	5.0	\$3,375.00
8/1/2023	Mark Frankel	Research re recent reinstatement case law (.5)	0.5	\$337.50
8/2/2023	Mark Frankel	Email client re recent reinstatement case law (.4)	0.4	\$270.00
8/21/2023	Mark Frankel	Drafted exclusivity extension motion (1.9)	1.9	\$1,282.50
<b>Plan and Disclosure Statement (including Business Plan)</b>			<b>46.1</b>	<b>\$31,117.50</b>

5/1/2023	Mark Frankel	Emails client re settlement (.1)	0.1	\$67.50
<b>Post-Trial Motions and Submissions</b>			<b>0.1</b>	<b>\$67.50</b>

3/6/2023	Mark Frankel	Teleconference McCord re settlement (.3); t/c client re same (1.1)	1.4	\$945.00
3/17/2023	Mark Frankel	Emails McCord re settlement (.1)	0.1	\$67.50
4/4/2023	Mark Frankel	Teleconferences McCord re settlement (.3); t/c's and emails client re same (1.1)	1.4	\$945.00
4/17/2023	Mark Frankel	Teleconference lender re settlement (.2); email client re same (.2); t/c client re same (.1)	0.1	\$67.50
4/20/2023	Mark Frankel	t/c's client and lender re settlement (.6); emails client re same (.3); emails lender re same (.2)	1.1	\$742.50
4/24/2023	Mark Frankel	c/c client re settlement (.7)	0.7	\$472.50
4/26/2023	Mark Frankel	Teleconference McCord re settlement options (.3)	0.3	\$202.50
4/27/2023	Mark Frankel	Prep lender re settlement (.4); to call re same (.4) c/c client and co-counsel re same (.3)	1.1	\$742.50
5/8/2023	Mark Frankel	Teleconferences client and co-counsel re settlement (.3); emails client and co-counsel re same (.2); email McCord re same (.1)	0.6	\$405.00
5/11/2023	Mark Frankel	Emails client re settlement with lender (.1); t/c client re same (.2)	0.3	\$202.50
5/15/2023	Mark Frankel	to meeting with lender re settlement (1.6); prepare same (.4); emails client and co-counsel re same (.1); t/c client and co-counsel re same (.4)	2.1	\$1,417.50
6/16/2023	Mark Frankel	Teleconference co-counsel re settlement (.2)	0.2	\$135.00
6/28/2023	Mark Frankel	t/c's co-counsel re 6/28 depositions and settlement (.3); emails co-counsel re same (.1)	0.3	\$202.50
6/29/2023	Mark Frankel	Emails co-counsel re same (.1); t/c co-counsel re same (.1)	0.2	\$135.00
7/5/2023	Mark Frankel	Teleconference client re settlement (.1); t/c and emails McCord re same (.1)	0.2	\$135.00
7/7/2023	Mark Frankel	Emails McCord re settlement (.1); emails client re same (.1)	0.2	\$135.00
7/11/2023	Mark Frankel	Teleconference co-counsel re settlements (.2)	0.2	\$135.00
7/14/2023	Mark Frankel	Teleconferences and emails client and co-counsel re adj for settlement purposes(.4); emails McCord re same (.1); email client re same(.1)	0.5	\$337.50

Outpost Pines

Backenroth, Frankel Krinsky, LLP

Post-Petition time - Categorized

7/25/2023	Mark Frankel	Teleconference co-counsel re settlement and sale of property (.6); email McCord re same (.1)	0.7	\$472.50
8/1/2023	Mark Frankel	Emails co-counsel re settlement meeting (.1)	0.1	\$67.50
8/4/2023	Mark Frankel	Emails co-counsel and lender re appraisal (.1)	0.1	\$67.50
8/7/2023	Mark Frankel	Reviewed appraisal (.3); prep for c/c lender re settlement (.5); c/c lender re settlement (.5)	1.3	\$877.50
8/8/2023	Mark Frankel	Teleconference co-counsel re settlement meeting and next steps (.5)	0.5	\$337.50
8/11/2023	Mark Frankel	Emails co-counsel re settlement and sale (.1) t/c's co-counsel re same (.4)	0.5	\$337.50
8/18/2023	Mark Frankel	Email co-counsel re settlement term sheet (.1); reviewed same (.4)	0.5	\$337.50
8/21/2023	Mark Frankel	Email co-counsel re revisions to term settlement sheet (.1)	0.1	\$67.50
<b>Settlement/Non-Binding ADR</b>			<b>14.8</b>	<b>\$9,990.00</b>

Backenroth, Frankel & Krinsky, LLP

Time Entries Summary  
Matter: Outpost Pines LLC

Asset Analysis and Recovery	2.6	\$1,755.00
Asset Disposition	0.6	\$405.00
Assumption/Rejection of Leases and Contracts	3.4	\$2,295.00
Business Operations	7.3	\$4,927.50
Case Administration	12.6	\$8,505.00
Claims Administration and Objections	1.4	\$945.00
Claims and Plan	0.3	\$202.50
Discovery	4	\$2,700.00
Fee/Employment Applications	9.5	\$6,412.50
Financing/Cash Collections	2.9	\$1,957.50
Meetings of and Communications with Creditors	6.7	\$4,522.50
Other Case Assessment, Development and Administration	2.0	\$1,350.00
Other Contested Matters (excluding assumption/rejection motions)	15.3	10327.5
Plan and Disclosure Statement (including Business Plan)	46.1	\$31,117.50
Post-Trial Motions and Submissions	0.1	\$67.50
Settlement/Non-Binding ADR	14.8	\$9,990.00
	<b>129.6</b>	<b>\$87,480.00</b>

Westlaw legal research - Period: June 1, 2023 - June 30, 2023 \$2,724.05